

August 20, 2017

To: Dan Ruben, Executive Director at Equal Justice America

Re: My Summer 2017 Fellowship Experience

Dear Mr. Ruben,

This summer, I worked as a law student advocate in the Federal Tax Clinic at the Legal Services Center of Harvard Law School. The clinic, located in the Jamaica Plain neighborhood near Boston, represents low-income taxpayers in controversies with the Internal Revenue Service. I applied to the clinic because I wanted to do three things: 1) interact with clients directly; 2) learn more about tax law; and 3) perform public service. My work this summer fulfilled all three of those objectives, and I am very happy with my decision.

Some of my clients had been assessed liability for an action that was either not their fault or that they did not understand the consequences of (or both). Some had claimed tax credits without providing the required documentation. Some had not filed taxes for years and could not afford to pay what they owed to the IRS. The multitude of issues that my clients faced meant that I needed to learn different areas of tax law and the different mechanisms for handling them with the IRS.

My interactions with clients was definitely what I will remember most about this summer. Most of them were understandably fed up with getting letters from the IRS and not having any idea what they said and what action was required on their part. (No one, regardless of his or her income level, can be expected to understand the content of communications from the IRS—and this includes some tax attorneys. If I were to make one change in IRS procedure, it would be a complete overhaul of its system for communicating with taxpayers.) My initial goal was to explain each client's issue to him or her as clearly as possible. This meant that I needed to understand the issues backwards and forwards, which was a big part of what made this summer a valuable teaching experience. I also wanted to make sure that my clients knew that they had someone in their corners who would not let any balls drop. This anti-anxiety function was an important one, and it was gratifying when they became more relaxed and grateful for the clinic's work as the summer progressed.

For instance, I will never forget the almost excessive amount of thanks I received from one client. She was a retired school teacher who was living in large part on her IRA. While she was the only principal on the account, she had unknowingly given her son access to it. He sold over \$200,000 in stocks, resulting in a \$35,000 tax liability to my client. Neither she nor her son knew enough about capital gains tax to understand that selling the stocks would trigger liability. So, when she told her son what happened and asked him to pay the tax bill, it resulted in an estrangement that has lasted over a year. I worked with the IRS officer to give them the documentation required to establish the basis and long-term nature of the gains, which cut her tax bill in half. When I told her that she would have to pay half of what she had been expecting to

pay, she was incredibly relieved. I explained why she had to pay the new amount and made sure that she would be able to explain everything to her son when they started speaking again.

Another one of my clients had gone through a period of drug addiction in a storage unit and did not file taxes during those years. Due to an injury, he is unable to work and thus could not pay the taxes he owed. Due to a lack of beds in nearby shelters, he spent most of his nights in his storage unit (which he had impressively rigged with electricity and basic necessities). I was impressed with how meticulous he was in his record-keeping, and we were able to compile the necessary documents and submit his Offer in Compromise to the IRS pretty quickly. We were very friendly, and most of our meetings consisted of much more sprawling conversations than those related to his tax issues.

Due to my previous work in the public service arena, I was not surprised that my clients were funny, intelligent, dignified, and hard-working. Most of them had worked for twenty or thirty years in jobs that did not offer a pension or assistance with retirement savings. Some had gone through their retirements during a period of addiction or a difficult family situation. I genuinely liked all of my clients, and I hope that they absorbed that affection.

Ultimately, I learned a lot this summer about federal income tax and about working directly with clients. Since neither they nor I knew much at all about income tax law coming into the summer, it was a valuable experience to explain what I was learning to them as I learned it. I am extremely grateful to Equal Justice America for helping me afford to devote a summer to furthering my legal education and making a difference in my clients' lives.

Sincerely,

David Rubin  
University of Virginia School of Law  
*J.D.*, Expected May 2019